

DIANA G. DICKINSON, ESQ.
Bar No. 13477
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, Nevada 89169.5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
Email: ddickinson@littler.com

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALERIE MCKINNEY,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., TSC ACCOUNTS RECEIVABLE
SOLUTIONS and
BACKGROUNDCHECKS.COM LLC,

Defendants.

Case No. 2:22-cv-01354-GMN-VCF

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[SECOND REQUEST]

Plaintiff VALERIE MCKINNEY ("Plaintiff") and Defendant
BACKGROUNDCHECKS.COM LLC ("Defendant"), by and through their undersigned counsel,
hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from
the current deadline of January 26, 2023, up to and including **February 27, 2023**.

This is the second request for an extension of time to respond to the Complaint. The requested
extension is necessary in light of the fact the parties have begun discussions regarding the scope and
handling of the case and potential resolution of this matter. The additional time will allow the parties
to complete these discussions for efficiency before having to engage in motion practice.

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1 This request is made in good faith and not for the purpose of delay, and the parties believe the
2 interests of judicial economy support granting this extension.

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4 Dated: January 26, 2023

Dated: January 26, 2023

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Michael Kind

8 MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

9 GEORGE HAINES, ESQ.
10 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 *Attorneys for Plaintiff*
VALERIE MCKINNEY

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13 **IT IS SO ORDERED.**

14 1-26-2023

Dated: _____

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UNITED STATES MAGISTRATE JUDGE

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